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UCP of Philadelphia and Vicinity  
102 East Mermaid Lane  
Philadelphia, PA 19118  
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Stephen A. Sheridan  
Executive Director

May 17, 2002

Ms. Carlyn Winter Prisk (3HS11)  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

Dear Ms. Prisk:

Enclosed is our Association's responses to the inquiry from your office dated May 10, 2002. If there remains any questions regarding the responses, please do not hesitate to contact my office at (215) 248-7601.

Sincerely,

Stephen A. Sheridan  
Executive Director

SAS:cmb  
Enclosure

c:\Program Files\Corel\WordPerfect Office 2000\docs\cover ltr to Carlyn Prisk from US Environmental Protection Agency re answers to interrogatories for the landfill sites at Clearview, Folcroft, Folcroft Annex.ltr

ORIGINAL  
(Rev)

**UNITED CEREBRAL PALSY ASSOCIATION OF PHILADELPHIA AND VICINITY**  
102 East Mermaid Lane • Philadelphia, PA 19118-3599

**REQUIRED SUBMISSION OF INFORMATION**  
**ENCLOSURE F**  
**ANSWER TO QUESTIONS**

**Question:**

1. State the name of your company, its mailing address, and telephone number. Further identify:
  - a. The dates and states of incorporation of your company;
  - b. the date and original state of incorporation of your company; and
  - c. the parent corporation of your company, if any, and all subsidiaries or other affiliated entities.

**Answer:**

1. United Cerebral Palsy Association of Philadelphia and Vicinity  
102 East Mermaid Lane  
Philadelphia, PA 19118-3599
  - a. Articles of Incorporation dated: August 19, 1946; Pennsylvania
  - b. Incorporated as a 501(c)(3) organization on April 21, 1949 in the state of Pennsylvania
  - c. N/A

**Question:**

2. What is the current nature of the business or activity conducted at your establishment(s) in the Philadelphia, Pennsylvania area? What was the nature of your business or activity between 1958 and 1976? Please describe in detail. If the nature of your business or activity changed from the period of 1958 to 1976 to the present, please provide a detailed explanation of the changes to date.

**Answer:**

The current nature of business in Philadelphia is a human service organization providing education, recreation, training and residential services for children and adults with disabilities. The activity stated previously was also provided between the years 1958 to 1976. UCP operates a rehabilitation center serving over 4,000 families per year. UCP maintains a staff of 300 employees. Employees are professionals (i.e., teacher, therapists, social workers and direct care workers). UCP of Philadelphia serves Philadelphia, Montgomery, and Bucks Counties. There are separate affiliates (not associated with Philadelphia) in Delaware and Chester Counties.

**Question:**

3. Identify all persons currently or formerly employed by your establishment(s) who have or may have personal knowledge of your operations and waste disposal practices between 1958 to 1976 at your facilities in the Philadelphia, Pennsylvania area. For each such person, state that person's employer, job title, dates of employment, current address, and telephone number. If the current telephone number or address is not available, provide the last known telephone number or last known address of such person.

**Answer:**

Between 1958 to 1974 cannot identify.

Between 1974 to present: Stephen A. Sheridan; hired as Director of Financial Affairs 1974 to 1976; UCP of Philadelphia and Vicinity; Executive Director from 1976 to present; currently located at: 102 East Mermaid Lane, Philadelphia, Pennsylvania 19118; Phone: (215) 248-7601.

Question:

4. Identify the owners and operators of your establishment(s) in the Philadelphia, Pennsylvania area from 1958 to the present. For each owner and operator further provide:
- The dates of their operation;
  - the nature of their operations; and
  - all information or documents relating to the handling and/or generation, storage, treatment, recycling, formulation, disposal, or transportation of any hazardous substance, hazardous waste, pollutant, contaminant, or other waste during the period in which they were operating the establishment(s).

Answer:

Same as 1. above.

Question:

5. Describe the types of documents generated or maintained by your establishment(s) in the Philadelphia, Pennsylvania area concerning the handling and/or generation, storage, treatment, transportation, recycling, formulation, or disposal of any hazardous substance, hazardous waste, pollutant, contaminant or other waste between 1958 and 1976.
- Provide a description of the information included in each type of document and identify the person who was/is the custodian of the documents;
  - describe any permits or permit applications and any correspondence between your company and/or establishment(s), and any regulatory agencies regarding the transportation and disposal of such wastes; and
  - describe any contracts or correspondence between your company and/or establishment(s) and any other company or entity regarding the transportation and disposal of such waste.

Answer:

No documents on file.

- No documents;
- No record of permits or permit applications, etc.; and
- No record of contracts, etc.

Question:

6. Identify every hazardous substance used, generated, purchased, stored, or otherwise handled at your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. Provide chemical analyses and Material Safety Data Sheets ("MSDS"). With respect to each such hazardous substance, further identify:
- The process(es) in which each hazardous substance was used, generated, purchased, stored, or otherwise handled;
  - the chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such hazardous substance;
  - the annual quantity of each such hazardous substance used, generated, purchased, stored, or otherwise handled;
  - the beginning and ending dates of the period(s) during which such hazardous substance was used, generated, purchased, stored, or otherwise handled;
  - the types and sizes of containers in which these substances were transported and stored; and
  - the persons or companies that supplied each such hazardous substance to your company.

Answer:

Not aware of any hazardous substance.

Question:

7. Identify all by-products and wastes generated, stored, transported, treated, disposed of, released, or otherwise handled by your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. With respect to each such by-product and waste identified, further provide:
- The process(es) in which each such by-product and waste was generated, stored, transported, treated, disposed of, released, or otherwise handled;
  - the chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such by-product or waste;
  - the annual quantities of each such by-product and waste generated, stored, transported, treated, disposed of, released, or otherwise handled;
  - the types, sizes, and numbers of containers used to treat, store, or dispose of each such by-product or waste;
  - the name of the individual(s) and/or company(ies) that disposed of or treated each such by-product or waste; and
  - the location and method of treatment and/or disposal of each such by-product or waste.

Answer:

No knowledge of by-products and wastes generated, stored, transported, treated, disposed of, released, or handled by organization.

Question:

8. Did your company ever contract with, or make arrangements with Clearview, Folcroft, Folcroft Annex, Eastern Industrial, Tri-County Hauling, S. Buckley Trash Hauling, Barratt Rupert, McCloskey Engineering, ABM Disposal Services, Marvin Jonas, Jonas Waste Removal, Paolino Company, Schiavo Bros., Inc., Gene Banta Trash Removal, City Wider Services, and/or any other company or municipality to remove or transport material from your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976 for disposal? If so, for each transaction identified above, please identify:
- The person with whom you made such a contract or arrangement;
  - the date(s) on which or time period during which such material was removed or transported for disposal;
  - the nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);
  - the annual quantity (number of loads, gallons, drums) of such material;
  - the manner in which such material was containerized for shipment or disposal;
  - the location to which such material was transported for disposal;
  - the person(s) who selected the location to which such material was transported for disposal;
  - the individual employed with any transporter identified (including truck drivers, dispatchers, managers, etc.) with whom your establishment dealt concerning removal or transportation of such material; and
  - any billing information and documents (invoices, trip tickets, manifests, etc.) in your possession regarding arrangements made to remove or transport such material.

Answer:

UCP did not contract with the firms listed in question 8.

Question:

9. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons who, between 1958 and 1976, may have:
- Disposed of or treated materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site;
  - arranged for the disposal or treatment of materials at Clearview, Folcroft and Folcroft Annex or other areas of Site; and/or
  - arranged for the transportation of materials to Clearview, Folcroft and Folcroft Annex or other areas of the Site (either directly or through transshipment points) for disposal or treatment.

Answer:

UCP of Philadelphia has no knowledge of Clearview, Folcroft and Folcroft Annex.

Question:

10. For every instance in which your establishment(s) disposed of or treated material at Clearview, Folcroft and Folcroft Annex or other areas of the Site, or arranged for the disposal or treatment of material at the Site; identify:
- The date(s) on which such material was disposed of or treated at the Site;
  - the nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);
  - the annual quantity (number of loads, gallons, drums) of such material;
  - the specific location on the Site where such material was disposed of or treated; and
  - any billing information and documents (invoices, trip tickets, manifests, etc.) in your company's or establishment's (s') possession regarding arrangements made to dispose of or treat such material at the Site.

Answer:

UCP of Philadelphia has no knowledge of Clearview, Folcroft and Folcroft Annex.

Question:

11. Did your establishment(s), or any other company or individual ever spill or cause a release of any chemicals, hazardous substances, and/or hazardous waste, and/or non-hazardous solid waste on any portion of Clearview, Folcroft and Folcroft Annex or any other portion of the Site? If so, identify the following:
- The date(s) the spill(s)/release(s) occurred;
  - the composition (i.e., chemical analysis) of the materials which were spilled/released;
  - the response made by you or on your behalf with respect to the spill(s)/release(s); and
  - the packaging, transportation, and final disposition of the materials which were spilled/released.

Answer:

UCP of Philadelphia has no knowledge of Clearview, Folcroft and Folcroft Annex.

Question:

12. Please identify individuals employed by your establishment(s) who were responsible for arranging for the removal and disposal of wastes, and individuals who were responsible for payments, payment approvals, and record keeping concerning such waste removal transactions at your Philadelphia, Pennsylvania area establishment(s) between 1958 and 1976. Provide current or last known addresses and telephone numbers where they may be reached. If these individuals are the same persons identified by your answer to question 3, so indicate.

Answer:

UCP of Philadelphia has no knowledge related to question 12.

Question:

13. Did you or any person or entity on your behalf ever conduct any environmental assessments or investigations relating to contamination at Clearview, Folcroft and Folcroft Annex or any other areas of the Site? If so, please provide all documents pertaining to such assessments or investigations.

Answer:

UCP of Philadelphia has no knowledge of Clearview, Folcroft and Folcroft Annex.

Question:

14. If you have any information about other parties who may have information which may assist the EPA in its investigation of the Site, including Clearview, Folcroft and Folcroft Annex, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, telephone number, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

Answer:

UCP of Philadelphia has no knowledge of Clearview, Folcroft and Folcroft Annex.

Question:

15. Representative of your establishment(s):

- a. Identify the person(s) answering these questions on behalf of your establishment(s), including full name, mailing address, business telephone number, and relationship to the company.
- b. Provide the name, title, current address, and telephone number of the individual representing your establishment(s) to whom future correspondence or telephone calls should be directed.

Answer:

Organization's Representative:

- a. Stephen A. Sheridan  
Executive Director  
UCP of Philadelphia and Vicinity  
102 East Mermaid Lane  
Philadelphia, PA 19118-3599  
(215) 248-7601
- b. Same as a. above.

Question:

16. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:
- a. Your document retention policy;
  - b. a description of how the records were/are destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;
  - c. a description of the type of information that would have been contained in the documents; and
  - d. the name, job title, and most current address known to you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

Answer:

Documents no longer available

- a. Document retention policy is seven years for financial information;
- b. no knowledge of records;
- c. no knowledge of records;
- d. no knowledge of records.

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